

IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
SHELLY REGEL and ROBERT L. : No. 4-16-02422
REGEL, :
Debtors :
QUICKEN LOANS, INC., : Chapter 13
Movant :
VS. :
SHELLY REGEL and ROBERT L. :
REGEL, :
Respondents :
:

ANSWER ON BEHALF OF DEBTORS SHELLY REGEL AND ROBERT L. REGEL
TO MOTION OF QUICKEN LOANS, INC.,
FOR RELIEF FROM AUTOMATIC STAY

COMES NOW, Shelly Regel and Robert L. Regel, Debtors herein ("the Regels"), by their attorneys, Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., and respectfully respond as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Denied. The Regels did miss the February 2017 and April 2017 payment but believe and therefore respond that they made the March 2017 payment. They will also be making the May 2017 payment later in the week.

7. Denied as stated. After they make the May 2017 payment later in the week, the Regels will be behind by two months. In addition, they will be making a triple mortgage payment in June 2017, when they

anticipate receiving a lump-sum disability award and reimbursement for employee travel expenses from April 2017. Finally, the Regels will be able to make regular monthly mortgage payments on a timely basis due to a monthly disability income.

8. Denied as stated. The Regels are without knowledge, information, or belief to form an opinion of the reasonableness of the legal fees. Proof on this issue is requested at the hearing on this Motion.

9. Admitted.

WHEREFORE, Shelly Regel and Robert L. Regel, Debtors herein, respectfully request that this Honorable Court deny the relief requested in the Motion for Relief from the Automatic Stay, filed by Quicken Loans, Inc., and for such other and further relief as is equitable and just.

Respectfully submitted,

STOVER, McGLAUGHLIN, GERACE,
WEYANDT & McCORMICK, P.C.

BY: /s/ Don Michael Hahn
Don Michael Hahn, Esquire
122 East High Street
Bellefonte, PA 16823
(814) 355-8235
Attorney for Debtors

danswer

I, Shelly Regel, Debtor herein, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 5/9/2017

/s/ Shelly Regel
Shelly Regel

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing documents upon the person(s) and in the manner indicated below:

Service by ECF Filing Notice as Follows:

James C. Warmbrodt, Esquire
Attorney for Movant

Charles DeHart, III, Esquire
Chapter 13 Trustee

DATED this 9th day of May, A.D., 2017.

-/s/ Donald M. Hahn